MOSES & SINGER LLP

The Cheysler Burdens 405 Lexington Avenue, NY, NY 10174-1299 Tel: 212.554.7800 Fax: 212.554.7700 www.mosessinger.com

Jennifer Nigro Direct: 212.554.7808 Fax: 212-554-7700 jnigro@mosessinger.com

MEMO ENDORSED

October 15, 2008

VIA FACSIMILE ONLY

Honorable Stephen C. Robinson United States District Court Southern District of New York 300 Quarropas Street, Room 633 White Plains, NY 10601

Re: Mclinda Serin, Judson Russ, Long Soui Lim, Peri Kettler, Gordon Redner, and Thomas J. Smith, v. Northern Leasing Systems, Inc., Jay Cohen, Rich Hahn, and Sara Krieger (Index No. 06 cy 1625)

Dear Judge Robinson:

This firm has recently been substituted as counsel for defendant Northern Leasing Systems, Inc. (NLS) and the individual defendants Jay Cohen, Rich Hahn and Sara Krieger in the referenced matter. On or about October 2, 2008, a copy of plaintiffs' amended complaint in this action was received via e-mail from plaintiffs' counsel. Currently, defendants have until Tuesday, October 21st to answer, move or otherwise respond to the amended complaint.

On consent of plaintiffs' counsel, Chittur & Associates P.C., we hereby request that the deadline for defendants to answer, move or otherwise respond to the amended complaint be adjourned to Friday, November 21st. This extension should allow defendants adequate time to respond to the allegations of the amended complaint, and allow this firm to better familiarize itself with the facts and procedural history of the case. No prior requests for an adjournment or extension have been requested.

Because it is likely that defendants' response will be in the form of a pre-answer motion, pursuant to Your Honor's individual rules concerning motion practice, we have conferred with plaintiffs' counsel on the following briefing schedule:

Defendants' pre-answer motion: Friday, November 21, 2008

Plaintiffs' opposition: Wednesday, January 14, 2009

Defendants' reply: Thursday, January 29, 2009

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:

DATE FILED

APPLICATION GRANTED

HON. STEPHEN C. ROBINSON

722484v2 011082,0121

Honorable Stephen C. Robinson October 15, 2008 Page 2

Respectfully submitted,

Jennifer Nigro

ce: Chittur & Associates, PC
Attn. Krishnan Chittur, Esq.